Ref: HFE/CERC /2017-18/01

Date: 13 Dec 2017

To
Sh. Sanoj Kumar Jha
Secretary
Central Electricity Regulatory Commission (CERC)
3rd and 4th Floor Chandelok Building, 36, Janpath
New Delhi -110001 - INDIA

Subject: Comments on draft Central Electricity Regulatory Commission (Grant of Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2017

Dear Sir,

This is with reference to the Public Notice No L-1/229/2017 dated 14.11.17 circulated by Honourable CERC requesting for suggestions/comments/objections on the draft Central Electricity Regulatory Commission (Grant of Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2017.

We appreciate the act of the commission to notify the draft connectivity regulations 2017 with objective of resolving the issues inter- alia related to the connectivity faced by the Renewable energy generators.

We are hereby submitting our comments / suggestions with this letter and marked as annexure -I, on Draft Central Electricity Regulatory Commission (Grant of Connectivity and General Network Access to the inter-State transmission system and other related matters) Regulations, 2017

We sincerely request the Hon’ble Commission to consider these suggestions while notifying the final guidelines.

Thanking you
For Hero Future Energies Pvt. Ltd

Kunal L. Kaistha
Chief Manager (Power Sales and Regulatory)

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<th>Sr. No</th>
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<td>1</td>
<td>2.1(w)</td>
<td>2.1(w): “Lead Generator” means a generator who is authorized through a formal agreement by other generators located in a geographically contiguous area for seeking interconnection with the ISTS at a single connection point and undertakes all operational and Commercial responsibilities in following the provisions of the Indian Electricity Grid Code and all other regulations of the Central Commission, such as grid security, scheduling and dispatch, collection and payment or adjustment of Transmission charges, deviation charges, congestion and other charges etc.</td>
<td>2.1(w): “Lead Generator” means a generator who is authorized through a formal agreement by other generators located in nearby vicinity or geographically contiguous area for seeking interconnection with the ISTS at a single connection point and undertakes all operational and Commercial responsibilities in following the provisions of the Indian Electricity Grid Code and all other regulations of the Central Commission, such as grid security, scheduling and dispatch, collection and payment or adjustment of Transmission charges, deviation charges, congestion and other charges etc.</td>
<td>The Land for the wind power projects is acquired as foot print over large land mass. Developers therefore do not have title of land for entire spread area of the wind power projects instead they have small portion of land enough for erecting and operating the wind turbine therefore two wind generators may be adjacent to each other but will not be having contiguous land. Hence contiguity of land should not be the criterion for determining lead generator for wind projects as the same cannot be established. For solar projects contiguity of land will not be an issue as only contiguous land is acquired. Hence the suggestion is as underlined.</td>
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2  17.1  Grant of GNA shall, by itself, not entitle any generating station to interchange any power with the grid till it either signs a PPA or sale purchase agreement (SPA) and inform the same to CTU and concerned RLDCs or sells power through exchange. An online portal for obtaining the information regarding PPA by a Generator or distribution licensee or trading licensee or consumer or any other entity shall be developed by CTU.

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There can be a situation where one generator has applied for GNA earlier to another generator but is not ready to interchange power with grid. Keeping in view the recent order of Hon'ble CERC in petition no 145/MP/2017 dated 29th Sep 2017, wherein it has been opined at para 114. (c) that all applicants who have been granted connectivity will be allowed physical connection based on their readiness for physical connectivity with the bays. GNA should also be allowed immediately to those RE generators ready to exchange power with the grid and who have been granted GNA.

This is more important and critical in fulfilling the renewable energy target set by the Govt. of India as RE projects have a short construction period of around 18 months.